



LITE DEPALMA  
GREENBERG, LLC

Newark • Chicago • Philadelphia

TWO GATEWAY CENTER, SUITE 1201  
NEWARK, NJ 07102

TEL: 973.623.3000  
FAX: 973.623.0858  
www.litedepalma.com

January 16, 2015

**VIA ECF**

Honorable Tonianne J. Bongiovanni, U.S.M.J.  
United States District Court  
District of New Jersey  
Clarkson S. Fisher Building and U.S. Courthouse  
402 East State Street, Room 6E  
Trenton, NJ 08608

RECEIVED

JAN 20 2015

AT 8:30  
WILLIAM T. WALSH  
CLERK

Re: *In re New Jersey Tax Sales Certificates Antitrust Litig.*  
Master Docket No.: 3:12-CV-01893-FLW-TJB

Dear Judge Bongiovanni:

Together with our co-counsel, this office represents plaintiffs and the class in this matter. This letter responds to Your Honor's December 8, 2014 directive that plaintiffs submit by today "a written status update regarding settlement discussions."

Since that time, plaintiffs have reached settlements in principle with all of the remaining defendants except for defendant Michael Mastellone. Draft settlement agreements with the defendants with whom plaintiffs have settled in principle are in various stages of preparation, circulation, and review. Plaintiffs currently anticipate that they will be able to submit those settlements to the Court for preliminary approval within a few weeks.

As to defendant Mastellone, the mediator appointed by the Court, Bruce I. Goldstein, Esq., has been in touch with counsel for plaintiffs and for Mastellone. The parties are working toward a mediation session with Mr. Goldstein sometime in the final week of January or shortly thereafter, depending on the availability of all counsel and Mr. Goldstein.

Should the Court have any questions about this status report, plaintiffs' counsel are available at the Court's pleasure. Thank you very much for your consideration.

Respectfully,

/s/ Bruce D. Greenberg

Bruce D. Greenberg

cc: All counsel (via ECF)

So Ordered  
*[Signature]*  
1/20/15

An update is to  
be provided by  
February 20, 2015